

Victor J. Braden, #18524  
Deputy Attorney General  
Criminal Litigation Division  
Kansas Attorney General's Office  
120 SW 10<sup>th</sup> Avenue, Second Floor  
Topeka, Kansas 66612-1597  
Phone: (785) 296-2215  
Email: vic.braden@ag.ks.gov

IN THE DISTRICT COURT OF BARTON COUNTY, KANSAS  
TWENTIETH JUDICIAL DISTRICT

STATE OF KANSAS,  
Plaintiff,  
vs.

THOMAS D. DRAKE,  
Defendant.

)  
)  
)  
)  
)  
)  
)

Case No. 2018 CR \_\_\_\_

---

COMPLAINT

---

**The State of Kansas**, by and through Derek L. Schmidt, duly elected and qualified Kansas Attorney General, and Victor J. Braden, duly appointed and qualified Deputy Kansas Attorney General, alleges and states against the defendant, **Thomas D. Drake**:

**COUNT ONE**  
**OBSTRUCTING APPREHENSION**  
**Severity Level 8 Non-Person Felony**

That on or about the 14<sup>th</sup> day of July, 2018, in Barton County, Kansas, **Thomas D. Drake**, did unlawfully, feloniously and knowingly harbor, conceal, or aid Kimberley Younger, knowing such person had committed a felony, to-wit: murder in the first degree (premeditated) as defined by K.S.A. 21-5402(a)(1), and amendments thereto, with the intent that such person avoid arrest for such felony.

**Section violated:**  
K.S.A. 21-5913(a)(1), and amendments thereto.

**Penalty sections:**  
K.S.A. 21-5913(b)(1)(A), and amendments thereto; and  
K.S.A. 21-6804, and amendments thereto.

**COUNT TWO**  
**OBSTRUCTING APPREHENSION**  
**Severity Level 8 Non-Person Felony**

That on or about the 14<sup>th</sup> day of July, 2018, in Barton County, Kansas, **Thomas D. Drake**, did unlawfully, feloniously and knowingly harbor, conceal, or aid Michael Fowler, knowing such person had committed a felony, to-wit: murder in the first degree (premeditated) as defined by K.S.A. 21-5402(a)(1), and amendments thereto, with the intent that such person avoid arrest for such felony.

**Section violated:**  
K.S.A. 21-5913(a)(1), and amendments thereto.

**Penalty sections:**  
K.S.A. 21-5913(b)(1)(A), and amendments thereto; and  
K.S.A. 21-6804, and amendments thereto.

**COUNT THREE**  
**OBSTRUCTING APPREHENSION**  
**Severity Level 8 Non-Person Felony**

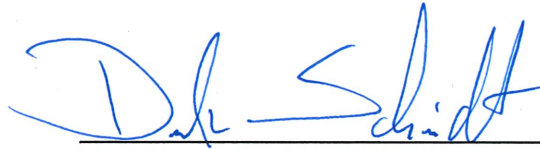
That on or about the 14<sup>th</sup> day of July, 2018, in Barton County, Kansas, **Thomas D. Drake**, did unlawfully, feloniously and knowingly harbor, conceal, or aid Rusty Frasier, knowing such person had committed a felony, to-wit: murder in the first degree (premeditated) as defined by K.S.A. 21-5402(a)(1), and amendments thereto, with the intent that such person avoid arrest for such felony.

**Section violated:**  
K.S.A. 21-5913(a)(1), and amendments thereto.

**Penalty sections:**  
K.S.A. 21-5913(b)(1)(A), and amendments thereto; and  
K.S.A. 21-6804, and amendments thereto.

**State's Filing #1  
(Complaint - Drake)**

Respectfully submitted,



---

Derek L. Schmidt, #17781  
Kansas Attorney General  
120 SW 10th Avenue, Room 200  
Topeka, KS 66612  
(785) 296-2215  
Attorney for the plaintiff



---

Victor J. Braden, #18524  
Deputy Attorney General  
120 SW 10th Avenue, Room 200  
Topeka, KS 66612  
(785) 296-2215  
Attorney for the plaintiff

**STATE'S WITNESSES**

Aguilar, Flavio  
Alarcon, Yanelli  
Allen, Traci  
Arnold, Josh  
Atkinson, Charles  
Atkinson, Inga  
Bailey, David  
Bass, Sam  
Beckham, Timothy  
Bellendir, Brian  
Bieberle, Scott  
Biggs, Peggy  
Bogart, Byron  
Bridges, James  
Brown, Ron  
Butts, William  
Camacho, Heriberto  
Carpenter, Nathan  
Carranza, Esteban  
Castro, Patrick  
Cole, Joe  
Cowett, Todd  
Craig, Adam  
Crims, Dwayne  
Crims, Nakia  
Cuthbert, Shannon  
Damante, James  
Dawa, Michael  
Depaz, Donal  
DeYoung, Ryan  
Diaz, Dario  
Dugan, Kevin  
Elizalde, Nikki  
Erickson, Stephen  
Eversole, Shae  
Firestine, Shawn  
Fowler, Michael  
Fox, Sparky  
Franklin, Marvin  
Frasier, Rusty  
Friedlein, Daniel  
Garcia, Jose  
Gibson, Amanda  
Gill, Jarrod

Glasscock, Aaron  
Gomez, Brayan  
Gonzales, Juan  
Gonzales, Oscar  
Gonzales, Ricardo  
Halls, Nicholas  
Haralson, Joe  
Haselhorst, Leon  
Hawkins, Clint  
Hernandez, Augustino  
Hernandez-Perdono, Carlos  
Hoffsommer, Heather  
Horton, Evan  
Huff, Donald  
Incarnacion, Bernadino  
Inman, John  
Jacobs, Robert  
Jeska, Christopher  
Jimenez, Dolores  
Jones, John  
Jones, Mark  
Jones, Tiffany  
Kampling, Brock  
Kendrick, Mark  
King, Verla  
King, Zach  
Kirl, Brandy  
Kokes, Charles  
Lacy-Trostle, Diane  
Latham, Cory  
Latham, Holly  
Lee, Kristi  
Lee, Zach  
Legg, Cynthia  
Linnehan, Michael  
Lucas, Logan  
Lussman, Robert  
Luther, Julie  
Mares, Marianna  
Mares, Tina  
Martinez, Arturo  
Maurico, Antonio  
McCormick, Denny  
McCormick, Luke



**State's Filing #1  
(Complaint - Drake)**

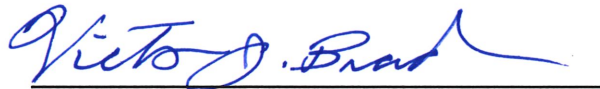
McCullough, Laura  
McGoldrick, Sharon  
McGrew, Matthew  
McLemore, Heather  
McVay, Jeffrey  
Mendoza, Oscar  
Middleton, Brett  
Miranda, Sergio  
Moomey, Roy  
Moore, Eric  
Murrieta, Luis  
Murrieta, Rodrigo  
Ortega, Luis  
Otto, Brenda  
Paden, David  
Peppas, Nick  
Perry, Daniel  
Perry, Daniel  
Pfeifer, Cindy  
Pfeifer, Cynthia  
Pfeifer, Mark  
Pindo, Samuel Vasquez  
Porter, Tyler  
Quojano, Julio  
Rausch, Michelle  
Reyes, John  
Reyes, Tomas  
Reynolds, John  
Rhoades, Ashley  
Ripp, Shelley  
Rivera, Rene  
Romero, Celso  
Rose, Rodney  
Schomaker, Ryan  
Seals, Warren

Sedano-Ponce, Luis  
Sellers, Cheryl  
Sellers, Julie  
Settle, Jason  
Shaw, Bill  
Simmons, David  
Slayton, Megan  
Smith, Donna  
Smith, Heather  
Smith, Randall  
Snodgrass, Dustin  
Sparks, Savannah  
Spencer, Lonnie  
Spencer, Scott  
Spruell, Rick  
Stover, Tyler  
Stroud, Patti  
Surowicz, Deborah  
Taylor, Brandon  
Tenney, Christine  
Threet, Donnie  
Unger, David  
Valdivia, Hayley  
Viney, Fred  
Volkel, Brian  
Wagner, Jason  
Wagner, Maverick  
Wagner, Salena  
Ward, Jeff  
Watkins, Sarah  
Wear, Jonathan  
Weaver, Steven  
White, Sarah  
Wilson, Gary  
Younger, Kimberly

VERIFICATION

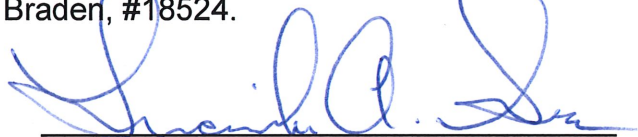
STATE OF KANSAS                     )  
  )  
COUNTY OF Shawnee            )       ss.

Victor J. Braden, of lawful age, being first duly sworn on oath deposes and states that he is an appointed and qualified Deputy Kansas Attorney General, and is authorized and empowered to prosecute for and on behalf of the State of Kansas and the matters and things set forth and contained in the above and foregoing Complaint are true and correct as he was informed and verily believes.



Victor J. Braden, #18524  
Deputy Attorney General  
Criminal Litigation Division

Subscribed and sworn to before me this 6th day of December, 2018,  
by Deputy Attorney General, Victor J. Braden, #18524.



Notary Public

My term expires:

